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then being an unlawful user of a controlled substance as defined in 21 U.S.C. Sec. 802, knowingly possessed firearms, to wit: a Camden Defense, Model CD-15, multi caliber semi-automatic rifle, Serial Number CD3197; an Anderson Manufacturing, Model AM-15, multi caliber semi-automatic rifle, Serial Number 20364910; an Anderson Manufacturing, Model AM-15, multi caliber semi-automatic rifle, Serial Number 21269226; an Anderson Manufacturing, Model AM-15, multi caliber semi-automatic firearm, Serial Number 20092784; an Anderson Manufacturing, Model AM-15, multi caliber semi-automatic rifle, Serial Number 21127287; a Glock, Model 43X, 9 caliber pistol, Serial Number BPTY407; a Glock, Model 19, pistol, Serial Number BHNZ906, a

Glock, Model 19, pistol, Serial Number BKZX116; and a Mossberg, 12 gauge shotgun, Serial Number V1237779; and ammunition, to wit, IMI Systems, 5.56 mm FMJ ammunition; Winchester, 5.56 mm FMJ M855 ammunition; Winchester, 12 gauge ammunition; Sellier & Bellot, 9x19 mm ammunition; Blazer, 9 mm Luger ammunition; Speer, 9 mm Luger ammunition; Igman, 9x19 mm Luger ammunition; Firequest, 12 gauge Flamethrower ammunition; and Barnaul Russian 2.23 Remington caliber (5.56x45 mm) FMJ ammunition, and the firearms and ammunition had travelled in and affected interstate and foreign commerce, in violation of Title 18, United States Code, Section 922(g)(3).

**COUNT TWO**  
**[18 U.S.C. § 922(g)(3)]**

That on or about the December 28, 2021, within the Western District of Texas, the Defendant,

**(2) PAOLA CONNELLY,**

then being an unlawful user of a controlled substance as defined in 21 U.S.C. Sec. 802, knowingly possessed firearms, to wit: a Camden Defense, Model CD-15, multi caliber semi-automatic rifle, Serial Number CD3197; an Anderson Manufacturing, Model AM-15, multi caliber semi-automatic rifle, Serial Number 20364910; an Anderson Manufacturing, Model AM-15, multi caliber semi-automatic rifle, Serial Number 21269226; an Anderson Manufacturing, Model AM-15, multi caliber semi-automatic firearm, Serial Number 20092784; an Anderson Manufacturing, Model AM-15, multi caliber semi-automatic rifle, Serial Number 21127287; a Glock, Model 43X, 9 caliber pistol, Serial Number BPTY407; a Glock, Model 19, pistol, Serial Number BHNZ906, a Glock, Model 19, pistol, Serial Number BKZX116; and a Mossberg, 12 gauge shotgun, Serial Number V1237779; and ammunition, to wit, IMI Systems, 5.56 mm FMJ ammunition; Winchester, 5.56 mm FMJ M855 ammunition; Winchester, 12 gauge ammunition; Sellier &



Bellot, 9x19 mm ammunition; Blazer, 9 mm Luger ammunition; Speer, 9 mm Luger ammunition; Igman, 9x19 mm Luger ammunition; Firequest, 12 gauge Flamethrower ammunition; and Barnaul Russian 2.23 Remington caliber (5.56x45 mm) FMJ ammunition, and the firearms and ammunition had travelled in and affected interstate and foreign commerce, in violation of Title 18, United States Code, Section 922(g)(3).

**NOTICE OF GOVERNMENT'S DEMAND FOR FORFEITURE**

**[See Fed. R. Crim. P. 32.2]**

**I.**

**Firearm Violation and Forfeiture Statutes**

**[Title 18 U.S.C. § 922(g)(3), subject to forfeiture pursuant to Title 18 U.S.C. § 924(d)(1), as made applicable to criminal forfeiture by Title 28 U.S.C. § 2461(c)]**

As a result of the foregoing criminal violation set forth above, the United States of America gives notice to Defendants **(1) JOHN MICHAEL CONNELLY, and (2) PAOLA CONNELLY** of its intent to seek the forfeiture of the properties described below upon conviction pursuant to FED. R. CRIM. P. 32.2 and Title 18 U.S.C. § 924(d)(1), as made applicable to criminal forfeiture by Title 28 U.S.C. § 2461(c). Section 924 states, in pertinent part, the following:

**Title 18 U.S.C. § 924.**

**\* \* \***

**(d)(1)** Any firearm or ammunition involved in or used in any knowing violation of subsection (a)(4), (a)(6), (f), (g), (h), (i), (j), or (k) of section 922, or knowing importation or bringing into the United States or any possession thereof any firearm or ammunition in violation of section 922(*l*), or knowing violation of section 924, shall be subject to seizure and forfeiture under the provisions of this chapter. . .

The Notice of Demand of Forfeiture includes but is not limited to the properties described below in Paragraph II.

**II.**  
**Properties**

1. Camden Defense, Model CD-15, multi caliber semi-automatic rifle, Serial Number CD3197;
2. Anderson Manufacturing, Model AM-15, multi caliber semi-automatic rifle, Serial Number 20364910;
3. Anderson Manufacturing, Model AM-15, multi caliber semi-automatic rifle, Serial Number 21269226;
4. Anderson Manufacturing, Model AM-15, multi caliber semi-automatic firearm, Serial Number 20092784;
5. Anderson Manufacturing, Model AM-15, multi caliber semi-automatic rifle, Serial Number 21127287;
6. Glock, Model 43X, 9 caliber pistol, Serial Number BPTY407;
7. Glock, Model 19, pistol, Serial Number BHNZ906,
8. Approximately 132 Rounds of .556 caliber ammunition;
9. Approximately 25 rounds of assorted 9mm caliber ammunition;
10. Approximately 60 rounds of assorted caliber ammunition;
11. Approximately 29 rounds of .556 caliber ammunition;
12. Approximately 1,070 rounds of assorted 9mm caliber ammunition;
13. Approximately 320 rounds of assorted 12 gauge ammunition;
14. Approximately 2,880 rounds of assorted .556 ammunition, and
15. Any and all firearms, ammunition, and/or accessories involved in or used in the commission of the criminal offense.

A TRUE BILL.

[REDACTED]  
FOREPERSON OF THE GRAND JURY

ASHLEY C. HOFF  
UNITED STATES ATTORNEY

BY: \_\_\_\_\_

Assistant U.S. Attorney